REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended claim 1. Applicant respectfully submits no new matter has been added. Accordingly, claims 1-4 and 8-15 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Claim Rejections – 35 U.S.C. § 102(e)

The Examiner rejected claims 1-4, 8, 9, and 11-13 under 35 U.S.C. § 102(e) as being anticipated by Agraharam et al. (US 6,407,988). The Applicant respectfully traverses the rejection of these claims as the Applicant has amended claim 1 to better define the intended scope of the claimed invention. The Examiner's consideration of the amended claims is respectfully requested.

The Agraharam reference appears to disclose mobility support services utilizing Mobility Aware IP Networks (MAIN). The purpose of the Agraharam reference is to provide additional privacy over a regular WAN. As noted by the Examiner, the MAIN is a WAN that operates according to Internet Protocol (IP) and may also include LANs. Agraharam states that a "Mobility Aware IP Network" is a wide area network that operates according to Internet Protocol (Col. 3, lines 12-13). The mobility support of the MAIN includes two types of WANs; MAINs that possess mobility support features and other WANs that do not possess the mobility support features (Col. 3, lines 5-31).

The MAIN appears to be a network including home agents and foreign agents that are located in mobility aware access networks. Participating mobile hosts are assigned a "virtual home address." The virtual home address is actually an address of the home agent located in the mobility aware access network. The home address provides additional privacy to the mobile host because it does not identify the mobile host's home premises network.

In contrast to Agraharam, the Applicant's invention provides a General Packet Radio Services (GPRS) method of re-routing an established session to user equipment when the user equipment roams from a first network to a second network. Agraharam

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states specifically that the MAIN utilizes Internet Protocol as opposed to the Applicant's invention, which utilizes PDP. The present invention uses Packet Data Protocol (PDP), as claimed in the amended independent claim 1, to initiate a tunnel establishment procedure (page 6, lines 13-29). As is well known in the art, PDP is a GPRS term for a range of protocols that support packet data transfer over a 3G wireless cellular network (see Newton's Telecom Dictionary). PDP is not Internet Protocol. As amended, claim 1 of the present invention contains recited steps that are not contained in the Agraharam reference. Support for the amendments to claim 1 is found on page 6, lines 13-29 of the specification.

Claims 2-4, 8, 9, 11, and 13 depend from amended claim 1 and recite further limitations in combination with the novel elements of claim 1. Therefore, the withdrawal of the rejection of claims 1-4, 8, 9, 11, and 13 is respectfully requested.

Claim Rejections – 35 U.S.C. § 103 (a)

Claim 10 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Agraharam in view of Turunen et al. (US 6,487,595, hereinafter Turunen). The Applicant respectfully traverses the rejection of this claim.

Turunen appears to disclose a method of transmitting data between a mobile host and a remote host via the Internet and a GSM/GPRS cellular network. The Turunen reference was cited for teaching that the first gateway is a GGSN. It is respectfully submitted that Turunen does not address the above-identified deficiencies of Agraharam reference with respect to Applicant's invention. The combination of the Agraharam and Turunen references fails to teach utilizing a PDP context request to initiate a transition of an active session when a mobile device changes networks. Therefore, the Applicant respectfully requests the withdrawal of the rejection of claim 10.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,
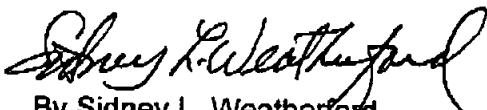
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